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**RUST** REMEDIAL SERVICES INC.

Bunker Hill Superfund Site  
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## Fax Cover Sheet

To:

Sean Sheldrake

Company:

USEPA

Phone No:

206 553-1220

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From:

Chris Zepernick / Jim Bushnell

Number of Pages including Cover:

Hard Copy Sent: Yes / No

Comments:

Final Version of revised  
Asbestos work plan.

USEPA SF



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1131 McKinley Ave.  
Kellogg, Idaho 83837  
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November 1, 1994

Mr. Frank Breidt  
Bunker Limited Partnership  
135 East Cameron Avenue  
Kellogg, Idaho, 83837-2353

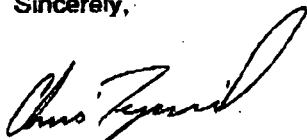
Re: Bunker Hill Mine Operations Area  
Remedial Action  
Revised Asbestos Abatement Work Plan and Visible Emissions Control Plan

Dear Mr. Breidt:

The final copy of Specialty Asbestos, Inc.'s (SAI) Revised Asbestos Abatement Work Plan and Visible Emissions Control Plan is attached. This final version of the plan incorporates the comments in the EPA letter of October 28, 1994. I have taken the liberty of forwarding a copy of this plan to Sean Sheldrake at the EPA.

Please call me at the job trailer if you have any questions.

Sincerely,



Chris Zepemick  
RUST REMEDIAL SERVICES  
Project Manager

cc: Sean Sheldrake, USEPA  
Armina Nolan, USEPA  
Job File 22119 - JC1054

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TOTAL P.02

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# **SPECIALTY ASBESTOS, INC.**

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## **REVISED WORKPLAN AND VISIBLE EMISSIONS CONTROL PLAN FOR**

### **ASBESTOS ABATEMENT AT THE MINE OPERATIONS AREA**

***Presented to:***

**BUNKER LIMITED PARTNERSHIP  
135 East Cameron Avenue  
Kellogg, Idaho 83837-2353**

**Attn: Mr. Frank Breidt, Project Manager**

***Revised:***

**October 26, 1994  
November 1, 1994**

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**ASBESTOS WORK AREA  
DAILY HOUSEKEEPING AND SITE SECURITY CHECKLIST**

<b>Work Area:</b>	
	<b>Condition Verified</b>
1) Bags are all taped and sealed.	
2) Bags are enclosed in poly sheeting.	
3) No visible ACM debris in work area.	
<b>Note Discrepancies and Corrective actions:</b>	

<b>Work Area:</b>	
	<b>Condition Verified</b>
1) Bags are all taped and sealed.	
2) Bags are enclosed in poly sheeting.	
3) No visible ACM debris in work area.	
<b>Note Discrepancies and Corrective actions:</b>	

<b>Work Area:</b>	
	<b>Condition Verified</b>
1) Bags are all taped and sealed.	
2) Bags are enclosed in poly sheeting.	
3) No visible ACM debris in work area.	
<b>Note Discrepancies and Corrective actions:</b>	

**Verify:**

- 1) All ACM in the disposal van is covered and sealed.
- 2) That the work area perimeter is secure, all signs are present, and all gates are closed.
- 3) That housekeeping in the decontamination facility is adequate, including used PPE is bagged and taped

Signed: \_\_\_\_\_ Date: \_\_\_\_\_  
 Specialty Asbestos Inc.

## **1.0 INTRODUCTION**

1.1 This revised project Asbestos Abatement Work Plan developed by Specialty Asbestos, Inc. (SAI), takes into account all current OSHA, USEPA, and SAI's current operating procedures. This plan is site specific and is outlined as it pertains to this project.

## **2.0 STAFF AND TRAINING**

2.1 SAI's work force will consist of a project manager, site superintendent, and work area foremen as needed. The site superintendent will also be the safety officer for this project. Crew size will be determined by the schedule needed to meet the project's overall completion date and requirements of the project work schedule. The site superintendent will be on site at all times during abatement removal.

2.2 All employees of SAI will be trained according to all OSHA and EPA regulations in the handling and removal of asbestos, and will be required to have a 40-hour HAZWOPER course. All supervisors will have a current "supervisor" training certificate from a AHERA accredited training provider.

2.3 Medical surveillance of all employees will be in accordance with OSHA regulation 29 CFR 1926.58/1910.120. All employees will have a medical exam before being allowed to work on this project. In addition all employees on this project will have biological testing (blood) for lead levels both before and after this project, to check for any exposure to lead in excess of OSHA standards.

## **3.0 MOBILIZATION**

3.1 After notice to proceed from RRS, SAI will mobilize to the job site with materials and equipment to complete removal and disposal requirements. These tools will include an office trailer and decontamination unit to be placed on the work site as determined at the pre-con meeting.

3.2 All work areas will be demarcated using rope and/or barrier tape at a distance of 25 feet from the removal areas and posted with OSHA required asbestos danger signs.

## **4.0 OPERATIONS**

### **4.1 Asbestos Containing Material Handling and Visible Emission Control**

#### **4.1.1 Friable ACM Pipe Insulation**

Friable ACM pipe insulation will be removed using the glove bag method for all pipe >2", according to Appendix J, OSHA regulations. Pipe insulation <4" will first be

wrapped in a double layer of 6-mil poly, then sections of ACM will be removed using glovebag methods at intervals of not less than 8' or wherever needed. Pipe will then be tape sealed at each end and cut out at these cleaned locations. These lengths of pipe will then be hand placed into the lined disposal truck for disposal.

The glove bags and friable material inside the glove bag will be immediately placed into a disposal bag after removal and will be tape sealed. The filled bags will be placed on a layer of poly and covered with a layer of poly. Filled bags will not be thrown, dropped, dragged or skidded when moving bags from work areas to staging areas or the lined disposal truck.

When the sealed bags containing friable ACM are transported to the disposal area they will be unloaded by hand. All friable ACM deposited at the disposal site will be covered with a 6" layer of slag at the end of the work shift on the day they are deposited.

#### **4.1.2 Non-Friable Asbestos Containing Material**

##### **4.1.2.1 Siding**

*Non friable CAB siding will be wetted using Hudson Sprayers. Nails will be pulled out or cut to minimize tile breakage when the tiles are removed. Tiles will be removed using hand methods, taking special care to keep breakage to a minimum.*

*CAB siding will then be stacked in a manlift on 6 mil poly. After the manlift is lowered to the ground the CAB will be removed from the manlift and wrapped into bundles. The bundles will be taken to a staging area until a full load has accumulated. The wrapped bundles will be loaded on the disposal truck, covered and transported to the disposal site. CAB siding shall not be dropped from any height.*

##### **4.2.1.2 Roofing**

*Non friable CAB roofing, sheet metal roofing and roofing felt will be removed using hand methods with a constant water mist sprayed at all times during removal. Water will have a surfactant/soap added for better absorption. No throwing, sliding, or skidding of material will be allowed while removing material from work area to edge of roof. Work practices will be incorporated to minimize the breakage of CAB panels. If the panels are found to be prone to breakage, work practices may include a rigid, hand carried sling to move panels on the roof. Any CAB panel that does break will immediately be picked up and placed into disposal bags and sealed.*

*CAB panels and sheet metal roofing will be staged on the roof until a full load has accumulated. The material will then be lowered to ground level using a crane/forklift, where it will be placed on 6 mil poly, wrapped and sealed. Bundles will be loaded onto the lined disposal truck, covered and transported to the disposal site.*

*Roofing felt will be placed in poly bags and sealed. The sealed bags will be hand lowered to a staging area on the ground level inside the building. When a full load has accumulated sealed bags will be loaded onto the disposal truck, covered and transported to the disposal site.*

#### **4.1.3 Debris**

Debris removal at the silo building and the crib retaining wall will be by wetting material and then placing into 6-mil disposal bags. Should the ambient fiber counts exceed .1f/cc the abatement crew will stop work and place a temporary poly enclosure around the work area. SAI will then place engineering controls inside the containment to provide 4 air changes per hour. After all loose material is picked up, work area will be inspected and a clearance air sample will be taken in a non aggressive manner. After clearance, all poly will be removed and bagged for disposal.

#### **4.1.5 Staging Areas**

*All areas where ACM is staged prior to transportation will be placed on poly sheeting. Staging areas will be misted as needed to control visible dust.*

### **5.0 SITE SAFETY AND PERSONNEL PROTECTIVE EQUIPMENT**

*5.1 All asbestos removal employees are required to read, understand and sign the following documents.*

- *RUST Remedial Services' Health and Safety Plan*
- *Specialty Asbestos' Revised Asbestos Work Plan*
- *Specialty Asbestos' Fall Protection Plan*

*5.2 All employees will be required to attend and sign-in at a DAILY Safety Meeting before working on site that day. Any questions regarding safety and compliance can be answered at that time.*

*5.3 Respiratory protection for abatement activities will be in accordance with SAI's respirator program (minimum 1/2 face negative pressure respirator with HEPA filters). Respirators will be worn at all times while within the work areas. Respirators will be worn under all layers of protective clothing.*

*5.4 Additional protective equipment will include full body disposable suits with head covers, and workers will be required to wear same at all times within the work areas during abatement activities. Workers will also be provided with steel toe rubber boots, work gloves and hard hat (where required).*

*5.5 While working on roofs, manlifts, or scissors lifts all employees will be required to wear a OSHA approved safety belt/harness. When employees are within*



ten feet of the edge of roof or when removing the CAB underlayment panels on the roof, they will be connected by a OSHA approved lanyard to a safety line of no less than 3000 lb breaking strength, with a limited free fall distance of no more than 5 feet. All employees required to wear a safety belt/harness will be required to read and sign SAI's fall protection plan for this site.

## **6.0 DECONTAMINATION**

6.1 A central decontamination unit will be located next to the job site office trailer. For non-friable ACM work areas, a single disposal suit will be utilized. For friable and glove bag work, as well as debris pickup, workers will utilize a double suit. Workers will don a double suit or single suit as needed for their work area, respirator, and foot protection, and a hard hat if required, before entering their respective work areas.

6.2 Any time an employee exits from the work area they will remove all the gross material from suits, remove 1st outer suit (if wearing), and dispose of as contaminated waste. With their respirator still on, employees will then go to the central decon unit. Decon will be accomplished by entering the airlock to dirty room, removing suit, placing into a container for disposal. Workers will pass through a second airlock into the shower, where they will decon their respirator before removing. They will then thoroughly shower with special attention to hands and hair. After showering, they will pass through another airlock into the clean room to don street clothes. Showering will be mandatory for all employees working on removal activities.

## **7.0 AIR MONITORING**

7.3 Air/monitoring during this project will be done by a SAI competent supervisor and will consist of personal and area samples. Area samples will be conducted inside the work zone at outer limits for glove bag work or outside of work zone (downwind) for non-friable ACM. The following are maximum levels and would cause corrective action if exceeded.

- A) During removal of non-friable ACM-no containment;  
ambient air counts of less than .1 f/cc.
- B) During glovebag work on friable ACM and/or debris pickup;  
not to exceed .1 f/cc.
- C) Inside a containment; fiber count shall not exceed 1.0 f/cc.

7.4 If any of the above fiber counts are exceeded, work will stop in the affected work area and work practices will be readjusted. Should counts exceed the maximum, a containment will be placed around the work area with necessary engineering controls.

7.5 In addition to air monitoring for asbestos, several "at random" personal samples for lead in air will be taken during the work (in different work area). This will allow a determination as to whether additional respiratory protection or controls might be needed to protect workers from lead exposure in excess of the OSHA limits.

## 8.0 TRANSPORTATION and DISPOSAL

8.2 Asbestos disposal and transportation will be done by SAs personnel. Transportation will be in a poly lined dump truck, covered for all non-friable ACM. All friable ACM will either be double bagged or double wrapped in 6-mil plastic. The truck will be covered with a tarp between work shifts and during transportation to the disposal site at the West Canyon lay down area. *A minimum of 6 inches of slag from the Slag Borrow Area will be used to cover all friable asbestos daily. A final layer of a minimum of 6 inches of slag will be placed over all friable and non-friable asbestos containing materials at the end of asbestos removal.*

8.3 *At the disposal site, all packages of non-friable Type I and II material, wrapped in 6 mil poly, will be sprayed with a coat of "Soil Sement" per the manufacturer's recommendation, whenever material is placed at site on the end of the work shift schedule. All friable material will be in 6 mil poly bags or wrapped, and will be covered with 6 inches of slag daily, at the end of the work shift, on all days that material is moved to the disposal site.*

## **9.0 HOUSEKEEPING AND SECURITY**

**9.1** *All work areas will be policed at the end of each work shift and any/all ACM will be picked up and placed into disposal bags. No ACM will be allowed to remain unsecured at the end of the work shift.*

*If any bags or poly barriers holding ACM are found to be broken or torn open in any way during the work shift, they will be immediately secured.*

*Specialty Asbestos' supervisor will visually inspect each work area at the end of the work shift and the results will be noted in the daily log. A copy of the each day's log will be submitted to the RRS Site Safety Officer each day for inclusion in the site records. The attached inspection form will be used by the SAI supervisor to document the inspection.*

## **10.0 DEMOBILIZATION**

**10.1** Demobilization will be accomplished after the entire work areas are inspected by the RRS representative and SAI's superintendent and all areas are cleared of ACM material per contract specifications. All equipment will then be decontaminated and removed from the project site.